

Exhibit F

Jacquelyn Callanen

February 28, 2023

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE WESTERN DISTRICT OF TEXAS
3 SAN ANTONIO DIVISION

4 LA UNION DEL PUEBLO)
5 ENTERO, ET AL.,)
6)
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Plaintiffs,)
vs.) Case No. 5:21-CV-844-XR

GREGORY W. ABBOTT, ET AL.,)
)
Defendants.)
)

OCA-GREATER HOUSTON,)
ET AL.,)
)
Plaintiffs,)
vs.) Case No. 1:21-CV-780-XR

JANE NELSON, ET AL.,)
)
Defendants.)
)

HOUSTON JUSTICE, ET AL.,)
)
Plaintiffs,)
vs.) Case No. 5:21-CV-848-XR

GREGORY WAYNE ABBOTT,)
ET AL.,)
)
Defendants.)
)

LULAC TEXAS, ET AL.,)
)
Plaintiffs,)
vs.) Case No. 1:21-CV-0786-XR

JANE NELSON, ET AL.,)
)
Defendants.)
)

MI FAMILIA VOTA, ET AL.,)
)

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13 ORAL AND VIDEOTAPED DEPOSITION OF
14 JACQUELYN CALLANEN
15 FEBRUARY 28, 2023

18 THE ORAL AND VIDEOTAPED DEPOSITION of
19 JACQUELYN CALLANEN, produced as a witness at the
20 instance of the Defendant, and duly sworn, was taken
21 in the above styled and numbered cause on Tuesday,
22 the 28th day of February, 2023 from 9:10 a.m. to
23 3:51 p.m., before PAMELA SUE PETERSON, Certified
24 Shorthand Reporter in and for the State of Texas,
25 reported by stenographic and computer-aided

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1 transcription, at the Office of the Texas Attorney
2 General, Weston Centre, 112 East Pecan Street,
3 3rd Floor, San Antonio, Texas 78205, pursuant to the
4 Federal Rules of Civil Procedure and the provisions
5 stated on the record or attached hereto.

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1 quantify how many left and then came back?

2 A. No, sir.

3 Q. Okay. Now, focusing for a moment on poll
4 watchers. Do you believe that there were any issues
5 of fraud in the 2022 general election that poll
6 watchers exposed in Bexar County?

7 A. No.

8 Q. I believe you testified last year that you
9 considered the training that was provided to poll
10 watchers to be a joke.

11 A. Correct.

12 Q. Do you remember that testimony?

13 A. Oh, absolutely.

14 Q. And in preparation for the general
15 election, was the same training given to poll
16 watchers?

17 A. No, they -- they did adapt it.

18 Q. And was the poll watcher training still a
19 joke?

20 A. Yes, sir.

21 Q. And why was that, in your view?

22 A. Again, the first time it was just them
23 listen -- listening to -- or it's not a PowerPoint.
24 I don't know what it's called, but it has sound. But
25 it's -- the sense of it, was just, like, a video they

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1 listened and no qualifiers did -- did they complete
2 it and there -- it was nothing. They just had their
3 certificate.

4 And then when we made our feelings known,
5 the -- they updated the PowerPoint to, then, ask some
6 questions after the -- whatever, like, the segment
7 and then there would be a couple questions, there
8 would be a segment and a couple questions. But at no
9 time did it have to pass -- you know, you have to
10 have a 70, you have to have a 75. There was -- there
11 was absolutely no metrics with it, that -- it's,
12 like, okay if we sat here and completed it, here's
13 your certificate. So, it still was not anything that
14 we compared to our election officials.

15 Q. So, it's your understanding that a person
16 could take the poll-watcher training and respond to
17 the questions, and respond to the questions
18 incorrectly and still pass the poll watcher?

19 A. Keep going. Yes, sir.

20 Q. In connection with the general election,
21 did you lose election judges because of concerns
22 about poll watchers?

23 A. Yes, sir.

24 Q. Did you lose other election employees?

25 A. No, not full-time staff. No.

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1 Q. Did you lose poll workers?

2 A. Yes.

3 Q. So, is it your testimony that there were
4 people who were experienced election judges,
5 experienced alternates, experienced election clerks,
6 who stopped working with you during the 2022 election
7 because they were concerned about poll workers?

8 A. Yes, sir.

9 Q. About poll watchers?

10 A. Yes, sir.

11 Q. And were there individuals who had been
12 election judges, alternates and election clerks who
13 ultimately did not decide not to work with you but
14 who needed persuasion and encouragement in order to
15 stay with you?

16 A. Yes.

17 Q. And are you able to estimate the amount of
18 time that you needed to put in to encouraging people
19 to remain with you despite the poll watcher
20 provision?

21 A. Again, I can't quantify it, but it was very
22 necessary, on a one-on-one basis. I mean, when you
23 have one of your better election officials tell you
24 that they're not -- no longer going to work now
25 because the poll watcher is going to be following

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1 here. And so, everybody is very, very outgoing, and
2 they're in a nonthreatening venue. They are among
3 friends and people who would consider family.

4 So, our goal is to capture as much
5 information as we can to be able to say in the pink
6 note, or it's -- at the next election, please be
7 aware, you'll have people trying to cross your
8 100-foot mark. Please be aware you have, you know,
9 overactive campaign workers. Please be aware, and
10 that kind of stuff.

11 Q. So, in -- in terms of -- of where
12 information that you have gained in those after
13 action meetings gets turned into writing, it would be
14 in the pink note?

15 A. Yes, sir.

16 Q. Anyplace else?

17 A. No.

18 Q. Okay.

19 A. I mean, you know, handwritten notes as
20 you're sitting there talking but then they get thrown
21 away.

22 Q. Okay. Do you know how many election judges
23 you lost before the 2022 general election because of
24 those individual's concerns about poll watchers?

25 A. Probably -- probably close to 20 percent

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1 because we did -- we also -- again, please
2 understand, we have our early voting sites.

3 Q. Uh-huh.

4 A. And again, per the code, as a vote center
5 county, if we have this building as a -- as an early
6 voting center, then it's required to be an election
7 day site. So, if you've been there for two weeks,
8 12 days, then the voters know to go there, so you
9 have to be there.

10 And I had -- I -- we had a -- had a couple
11 of our election officials in November specifically
12 that completed early voting and then let us know at
13 the end that they weren't going to do election day.
14 They -- they -- they couldn't take it anymore. They
15 just -- they -- they were exhausted, mentally and
16 physically stressed. They weren't going to do it.
17 So, you know, we -- we put somebody else in there.

18 Q. And that -- when you say "a couple," was
19 it -- was it two? Or was it more than two?

20 A. It was a few more.

21 Q. Okay. And those individuals, were they
22 judges, alternates or clerks?

23 A. The way it usually happens, sir, is that
24 those groups are really tight-knit. They trust each
25 other. They know how to handle it. So, if the

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1 and then all of a sudden you're getting somebody,
2 argh, argh, argh, argh, that's growling at them as
3 they're handing their, you know, ID over to them.
4 So, again, it -- it had a different tone.

5 Q. And -- so now to change the topic just a
6 little. You testified back a year ago, little less
7 than a year ago, that the secretary of state's office
8 had not provided a handbook for election judges.

9 A. It's true.

10 Q. Did they -- did that office get a handbook
11 to you for election judges in advance of the 2022
12 general election?

13 A. Yes.

14 Q. Okay. But am I correct that that handbook
15 did not include material concerning poll watchers?

16 A. It had -- it had a synopsis. But again,
17 that's why we -- I felt compelled to give them the
18 complete handbook of the poll watcher. These are the
19 rules that they should have, so take a minute to read
20 these, you know.

21 Q. Did you give your election judges any
22 guidance concerning how close a poll watcher could
23 get to a voter?

24 A. No.

25 Q. And did you give them any guidance